

**Arent Fox** 

April 2, 2018

VIA ECFS

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 Stephanie A. Joyce

Partner 202.857.6081 DIRECT stephanie.joyce@arentfox.com

Re: WC Docket No. 12-375, Annual Report of Securus Technologies, Inc. for 2017

**VOLUMINOUS FILING** 

Dear Secretary:

Securus Technologies, Inc. ("Securus"), in compliance with 47 C.F.R. § 64.6060, hereby files two (2) disks containing its Annual Report for the calendar year 2017. This report comprises more than 270,000 pages of data and therefore must be filed on DVD. Electronic filing is not feasible in any format. Securus employed this same means of filing for its first Annual Report filed June 30, 2017, and has consulted Staff of the Wireline Competition Bureau.

In accordance with DA 17-508, Securus files this report in both a Confidential and a Public version. Each version of the Annual Report fits on one disk.

Robert Pickens, President and Chief Executive Officer, has signed the required certification which is filed herewith and will be filed via ECFS along with this letter.

Securus also provides, in a separate envelope, a set of DVDs for Staff as a courtesy for their ease of reference.

The Confidential version of this Annual Report is protected by DA 13-2434, because it contains sensitive, non-public data about Securus's service offerings and revenue that is protected by Commission Rule 0.459, 47 C.F.R. § 0.459. Specifically, it contains information that is both "commercial" and "financial," the disclosure of which would "result in substantial competitive harm." *Id.* § 0.459(b)(3) & (5). This information also meets the federal FOIA exemption for "trade secrets and commercial or financial information[.]" 5 U.S.C. § 552(b)(4).

Please date-stamp the enclosed copy of this letter and return it to the bearer.

Thank you for your consideration.

**Arent Fox** 

Marlene H. Dortch April 2, 2018 Page 2

Sincerely,

s/Stephanie A. Joyce

Counsel to Securus Technologies, Inc.

Enclosures

ce: Gregory Capobianco, Pricing Policy Division, Wireline Competition Bureau (*via hard copy and electronic mail*)